

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

PARKER PELHAM, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

vs.

VBIT TECHNOLOGIES CORP., VBIT MINING
LLC, VBIT DC CORP., ADVANCED MINING
GROUP, DANH CONG VO A/K/A DON VO,
PHUONG D VO A/K/A KATIE VO, SEAN TU, JIN
GAO, LILLIAN ZHAO, AND JOHN DOE
INDIVIDUALS 1-10, AND DOE COMPANIES 1-10,

Defendants.

C.A. No.: 23-cv-162-JLH-SRF

CLASS ACTION

**DECLARATION OF BRIAN E. FARNAN IN SUPPORT OF
OPPOSITION TO JIN GAO'S MOTION TO DISMISS AND
CROSS MOTION TO AUTHORIZE ADDITIONAL TIME TO SERVE JIN GAO**

I, Brian E. Farnan hereby declare under penalty of perjury:

1. I am an attorney of Farnan LLP, Liaison Counsel in this action, and have personal knowledge of the facts set forth herein. I am duly admitted to practice law in the State of Delaware and before this Court. I make this Declaration in support of the Opposition to Jin Gao's Motion to Dismiss and Cross Motion to Authorize Additional Time to Serve Jin Gao.

2. Attached hereto as Exhibit A is a true and correct copy of the declaration of Brian E. Farnan.

3. Attached hereto as Exhibit B is a true and correct copy of the emails between Counsel for Plaintiffs and Counsel for Jin Gao concerning, *inter alia*, alleged deficient service.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: September 30, 2024

/s/ Brian E. Farnan

Brian E. Farnan